

# THOMAS E. CASEY

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August 21, 2009

Bill Storm, Project Manager  
Minnesota Department of Commerce  
85 -7<sup>th</sup> Place East, Suite 500  
St. Paul, MN 55101-2198

VIA E-MAIL ONLY  
bill.storm@state.mn.us

RE: Comments to Final Environmental Impact Statement (FEIS)  
Prairie Island Nuclear Generating Plant  
Extended Power Uprate and Additional Dry Cask Storage Proposals

Dear Mr. Storm,

On behalf of the West Metro Global Warming Action Group, Inc., I submit the following comments to the Final Environmental Impact Statement (FEIS) for Xcel Energy's "Extended Power Uprate" Proposal and the "Additional Drycask Storage" Proposal for the Prairie Island Nuclear Generating Plant (PINGP).

As background, the West Metro Global Warming Action Group, Inc. is a Minnesota not-for-profit corporation whose mission is to alleviate the deleterious effects of global warming by building a renewable and environmentally sustainable energy economy. A three-prong strategy has been adopted to achieve this mission:

1. Promote the full funding for the aggressive research and development of renewable, environmentally sustainable, energy sources;
2. Promote full funding for the aggressive research and development of energy conservation measures; and
3. Phase out non-renewable and environmentally unsustainable energy sources (including, but not limited to, coal, ethanol, **nuclear power**, and oil) at the earliest possible date.

Consistent with the mission and strategies stated above, West Metro Global Warming Action Group, Inc. **concurs with the contents of the PINGP Study Group's letter to your office dated August 10, 2009.**

Of particular importance, the FEIS is insufficient until it contains a rigorous analysis of the environmental consequences in the event that long-time, on-site storage is required – and how to ensure "institutional control" during this protracted time.

My client also agrees with the May 8, 2009 letter from the “Prairie Island Indian Community Legal Department,” which convincingly argues why the state environmental review process – and the Certificate of Need (CON) processes – must be postponed until the federal environmental, health, and safety review processes have been completed. The FEIS must contain a response to this request. This letter reminds all of us, “The Prairie Island Indian Community is the largest, most diverse and culturally significant population immediately adjacent to the Prairie Island Nuclear Generating Plant. Since we bear the greatest risk from PINGP operation, it is our responsibility to ensure that the impacts of operation of PINGP on our Community and the surrounding environmental resources are fully evaluated.”

Finally, my client regrets that the November 14, 2008 Scoping Decision excluded the impacts of the proposed projects on the nuclear fuel cycle. (The Scoping Decision states that this issue is supposed to be covered in the federal EIS, which is another reason why the state EIS and CON processes should be postponed.) The documents contained on my client’s website provide ample evidence why the unsafe and dirty nuclear energy cycle (from mining to disposal) should not be expanded. [See [wmgwag.org](http://wmgwag.org) – then press “legislative updates” for 6-page letter (including exhibits 1-11).]

On behalf of West Metro Global Warming Action Group, Inc., I thank you in advance in anticipation of your kind consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "Thomas E. Casey", is written over a light gray rectangular background.

Thomas E. Casey

TEC/rf

cc: West Metro Global Warming Action Group, Inc.  
files

P.S. – I have placed West Metro Global Warming Action Group, Inc. on your electronic mailing list and look forward to continuing involvement in this proceeding.